

**REMARKS**

Claims 1, 2, 4-7, 9-15 and 17-21 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Staten (U.S. Patent No. 1,097,824) in view of Panaroni (U.S. Patent No. 5,254,045) and Yunan (U.S. Patent No. 3,894,593). Withdrawl of the rejection and allowance of the application are respectfully requested in view of the comments below.

Staten is directed to a tubeless tire filled with a core of relatively large (i.e., “appreciable size”) solid tire particles of and adhesive material wherein the tire particles and adhesive material are assembled in a mold, vulcanized into a complete tire innard to which the tire casing is “forced into place under considerable pressure and by means of suitable clamps.” (see Staten col. 3, lines 34-36). Staten does not disclose or suggest a method of producing a tire with a substantially filled core comprising: combining core bits and a liquid virgin polyurethane in a solution; and introducing the *resulting solution* into the core.

The tires of Staten are tubeless tires formed with an innard of prevulcanized, relatively large tire particles and adhesive material (see Staten col. 3, lines 30-35, “...the usual inner tubes shall be removed and the filler inserted in lieu thereof...”). Further, the tires of the present invention are more resilient to premature failure due to poor bonding between the adhesive material and tire particles and have superior performance characteristics than tires filled with procured or prevulcanized tire particles and adhesive material. Staten does not recognize this problem; hence Staten provides no motivation to combine the core bits and virgin polyurethane of the present invention into a solution and pump that solution into the core prior to vulcanization. The claimed invention is an improvement over the tires disclosed by Staten for the reasons set forth in the specification.

Neither Panaroni nor Yunan remedy the defects of Staten or suggest the claimed invention. Panaroni discloses a dessicated rubber embedded into a polyurethane which is then molded into a tire. Panaroni does not teach or suggest a method of producing a tubed or tubeless tire comprising a solution of virgin polyurethane and core bits that are pumped into the core prior to curing or vulcanization. Yunan discloses a structure made from dumping shredded polyurethane foam and pnuemacel fibers wetted with latex, into an open mold. One skilled in the art would not have combined either Panaroni or Yunan with Staten and none of these

references suggest such a combination. Further, even if combined, the combination of Panaroni or Yunan with Staten does not arrive at the claimed invention because none of these references teach a method of producing a tire that introduces a solution of core bits and virgin polyurethane into the core. Accordingly, withdrawal of this rejection is respectfully requested.

Claim 16 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Staten (U.S. Patent No. 1,097,824) in view of Panaroni (U.S. Patent No. 5,254,045) as applied in claim 1 and Yunan (U.S. Patent No. 3,894,593) and Khais (5,634,599). For the reasons discussed above with respect to claim 1, Staten in combination with Panaroni and/or Yunan do not teach or describe the invention claimed in claim 1. Khais describes a method of processing used tires using multiple grinding steps. However, Khais also does not teach or discuss a method of producing a tire with a substantially filled core comprising: combining core bits and a liquid virgin polyurethane in a solution; and introducing the resulting solution into the core. Therefore, it does not add anything to the deficiencies discussed above with respect to Staten, Panaroni, and Yunan. Accordingly, withdrawal of this rejection is respectfully requested.

Claim 22 stands rejected under 35 U.S.C. 103(a) as being unpatentable over the admitted prior art (Page 3, lines 3-12) in view of Inoue (JP 04087803). The admitted prior art is directed to a “method of producing a flatproofed tire currently using all new flatproofed material.” This admitted prior art does not include “core bits” as claimed, much less a *solution of “core bits” and liquid virgin polyurethane*. The flatproofed material of the admitted prior art is an uncured liquid that has no particle size and is significantly different from, and not analogous to, the cured, solid “core bits” of claim 22. Inoue similarly has no teaching or description of “core bits” as recited in claim 22, much less a teaching or description of the solution of “core bits” and liquid virgin polyurethane as currently set forth in claim 22. Accordingly, withdrawal of this rejection is respectfully requested.

Claim 23 stands rejected under 35 U.S.C. 103(a) as being unpatentable over the admitted prior art (Page 3, lines 3-12) in view of Inoue (JP 04087803) and Khais (U.S. Patent No. 5,634,599). Neither Inoue nor Khais provide a teaching to modify the admitted prior art to arrive at the claimed invention. For example, neither Inoue nor Khais teach “core bits” or a solution of “core bits” and liquid virgin polyurethane as claimed. Accordingly, withdrawal of this rejection is respectfully requested.

CONCLUSION

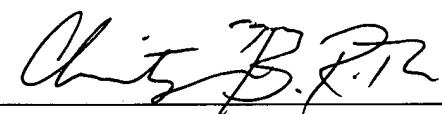
In view of the above remarks, withdrawal of the rejection and issuance of a Notice of Allowance is requested.

Respectfully submitted,

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